

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	No.: 16-cr-10305-NMG
	)	
MARTIN GOTTESFELD	)	

DEFENDANT’S MOTION *IN LIMINE* TO EXCLUDE INFLAMMATORY  
AND UNFAIRLY PREJUDICIAL TERMINOLOGY, INCLUDING “TERRORIST,”  
“TERRORISM,” AND SIMILAR LANGUAGE

The defendant moves this Honorable Court *in limine* to exclude inflammatory and unfairly prejudicial terminology during the trial, including “terrorist,” “terrorism,” and similar language. As grounds, such testimony:

1. Any such terminology is irrelevant. FRE 401.
2. Any such terminology is inadmissible bad character evidence. FRE 404(a)(1).
3. The probative value of such terminology, if any, is substantially outweighed by the danger of unfair prejudice, misleading the jury, undue delay, and wasting time. FRE 403.
4. Exclusion is necessary to protect the defendant’s constitutional rights to due process of law and a fair trial under the Fifth Amendment to the United States Constitution.

Respectfully submitted,  
MARTIN GOTTESFELD  
By his attorney:

/s/ David J. Grimaldi

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DATE: June 29, 2018

CERTIFICATE OF SERVICE

I, David J. Grimaldi, hereby certify that true copies of this motion were served on all registered participants in this matter via CM/ECF this 29th day of June 2018.

/s/ David J. Grimaldi

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David J. Grimaldi